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Mr. Lee Hamilton and Mr. Brent Scowcroft  
Blue Ribbon Commission Co-Chairs  
U.S. Department of Energy  
1000 Independence Avenue, S.W.  
Washington, D.C. 20585  
[CommissionDFO@nuclear.energy.gov](mailto:CommissionDFO@nuclear.energy.gov)

The Honorable Messrs. Hamilton and Scowcroft:

As the Blue Ribbon Commission comes to the end of its second full year of investigation into the storage of high-level radioactive waste, San Luis Obispo Mothers for Peace strongly asserts the following:

- Given that there is not now, nor is there in the foreseeable future, a means of isolating the radioactive wastes already accumulated by nuclear reactors in the U.S. for the hundreds of thousands of years required, the final BRC report must clearly recognize that stopping the generation of any additional radioactive waste is crucial to the implementation of any reasonable and responsible waste management plan.
- Transportation of radioactive wastes on roads, rails or barges only adds to the safety and security problems. Therefore

“interim” sites should be the same as the sites for current waste storage.

- “HOSS” or hardened on-site storage in dry casks at existing plants should be implemented at an accelerated rate.
- SLOMFP strongly opposes the privatization of radioactive waste management. It is essential that all aspects of radioactive waste management be subject to the requirements of the Sunshine laws including Federal Advisory Committee Act, the Freedom of Information Act and other forms of transparency and public access to participation and information.
- In this age of terrorism, the consideration of privatization of plutonium or any use of it in an "open market" setting is counter to common sense or public safety.

San Luis Obispo Mothers for Peace (SLOMFP) joins with the Alliance for Nuclear Responsibility in urging the panel to schedule a future meeting near either the San Onofre or Diablo Canyon nuclear power plant in California.

The Commission has a unique opportunity to gather information from the State of California, from its plant operators, and from the communities most immediately affected by the radioactive wastes stored at the two earthquake-prone California plants. The Boards of Supervisors of both San Luis Obispo and Santa Barbara Counties - both downwind of the Diablo Canyon plant - have over the past year sent letters to the NRC related PG&E's application for license renewal for the Diablo Canyon nuclear plant. Today the San Luis Obispo County Board of Supervisors began a process for drafting a letter related to the design and review of planned seismic studies of the newly discovered Shoreline Fault near the Diablo Canyon reactors. It behooves the BRC to hear from these elected local representatives.

Since SLOMFP has had intervenor status with the Diablo Canyon plant since 1973, that is the site about which SLOMFP is best informed. Another unique source of information about the Diablo Canyon plant is the Diablo Canyon Independent Safety Committee. While this entity has no enforcement powers, it has built a useful

record of information specific to Diablo Canyon, with most of its information coming from Pacific Gas and Electric Company.

The Commission must be well aware that the Diablo Canyon site is surrounded by 13 earthquake faults, one of which, the Shoreline, was not identified until 2008. Pacific Gas and Electric Company projects that its seismic studies of this fault will not be completed until December, 2015. SLOMFP has concerns about the way PG&E is designing this study and about the thoroughness with which other faults, and their possible connections, have been studied in past decades. We have requested that the seismic studies be independently overseen during the design, collection, and analysis stages.

The Commission must also take into account the recommendations of the Near Term Task Force that studied the Fukushima disaster and issued its Recommendations for Enhanced Reactor Safety in the 21<sup>st</sup> Century. Several of the Task Force recommendations show concerns about the safe and controlled storage of radioactive wastes in spent fuel pools, especially those in seismically active areas. It is incumbent upon this Commission to be informed of the state of spent fuel storage at both California plants and of the implications of the Task Force Recommendations. The failure of the Nuclear Regulatory Commission to implement the Task Force findings promptly, as recommended in the Task Force Report, is currently under legal challenge. (See NRC Decision re Emergency Petition 9-9-11.pdf , docket 50-275-LR and others; also counter-filings from multiple parties being filing today, September 13, 2011.)

Multiple California elected officials are on the record with questions and recommendations about radioactive waste storage at the California plants, including Congresswoman Lois Capps, Senators Barbara Boxer and Dianne Feinstein, and California State Senator Sam Blakeslee. After the Fukushima disaster, Senator Feinstein specifically asked the NRC to order faster transfer of spent fuel from pools to dry casks, but the NRC has largely if not completely ignored her request. The BRC should study and take into account the recommendations of all these elected representatives.

SLOMFP urges the Blue Ribbon Commission to place public safety above industry convenience in completing its work.

Respectfully submitted,

Jane Swanson on behalf of San Luis Obispo Mothers for Peace